

Exhibit P



Brief Biography for HE. Prof. Dr. Abdullah bin Saleh Al-Obaid

Growing Up:

Prof. Dr. Abdullah bin Saleh bin Obaid Al-Obaid was born in Al-Badaie in Al-Qassim Region, Saudi Arabia in 1361 AH / 1941 AD

Academic life :

- Received a degree from the Faculty of Arabic at Imam Muhammad bin Saud Islamic University in 1387AH / 1967 AD.
- Earned a senior management course at the Institute of Public Administration in Riyadh in 1390 AH / 1970 AD .
- Received a master's degree in Curriculum and Educational Evaluation at Oklahoma State University , USA in 1397AH / 1977AD .
- Received a in Doctorate's Degree Curriculum and Educational Evaluation at Oklahoma State University in 1399 AH / 1379 AD .
- Earned a rehabilitation course for military officers in 1400 / 1980 .

Career :

- Representative of the General Presidency for Girls' Education in Al-Zulfi in 1383 AH / 1963 AD .

- Editor at the Ministry of Defense and Aviation and the Royal Saudi Air Force in 1384 AH to 1388 AH / 1964-1968 AD.
- Alecturer at the Faculty of King Faisal Air Academy , a director of the chief commander office, a command of the educational wing in KFAA from 1388 to 1401 AH / 1968 to 1981AD , including six years of military rank .
- Assistant Undersecretary for Administrative Affairs in the General Presidency of the Two Holy Mosques Affairs in 1401 AH/ 1981, then Vice- Chairman for the Holy Prophet's Mosque Affairs in 1402 AH / 2002 AD .
- Deputy President of Medinah Islamic University in 1402 AH / 1982 AD , then President of the University from 1403 to 1416 / 1983-1996 AD .

Secretary - General of Muslim World League in Makkah from 1416 to 1421 AH / 1996 - 2001 AD , and during that, He occupied the following:

- Secretary- General of Supreme Council of the World Mosques.
- Chairman of the Scientific Miracles in the Holy Quran and Sunnah.
- Vice President of Islamic Fiqh Council .
- Chairman of the Board of International Islamic Relief Organization .
- A member of Shura Council from 1422 to 1425 AH / 2002 -2005AD
In the meantime He was the founder and president of National Society of Human Rights.
- Minister of Education from 1425 to 1430 AH / 2005-2009 AD, and during that, He occupied the following:

- Vice President of King Abdul Aziz and his Men Foundation for Talent and Creativity.
- Deputy Chairman of Supreme Committee for Education Policy.
- Chairman of Saudi Scouts Association.
- Chairman of National Committee for Childhood.
- Chairman of National Committee for Education, Science and Culture (UNISCO).
- Member of Board of Civil Service.
- Member of Supreme Council of Universities.

Cultural, Conferences, and Seminars Activities :

- Participation in many councils, conferences and seminars, local, regional and international concerning: Da'awah, education, Muslim minorities affairs, human rights, and dialogue among the followers of the different religions, cultures and civilizations.
- Supervision of number of Masters and PhDs discussions, and evaluation of paper researches.
- Preparing some studies, researches and worksheets, such as:
 - A comparative study between King Faisal Air Academy's Curriculum and the United States Air Academy's Curriculum.
 - Vocational and Technical Education Man Power Development in Kingdom of Saudi Arabia.
 - Notes in leadership and Characters Building .
 - Saudi Arabia 's efforts for Islam and Muslims in East Asia.
 - Saudi Arabia 's achievements for Islamic bodies and organizations .

- Saudi Arabia 's efforts in supporting the case of Palestine.
- Kingdom , Islam and civilizations dialogue.
- Are the Arab states supporting terrorism? Saudi Arabia as a model.
- Human Dignity in Islam.
- Civilizations and Cultures: Harmony or Conflict.
- Non-Muslims Rights in Islam : Permissions coexistence between Muslims and Christians.
- Terrorism and how to Confront it .
- Knowing each other leads to Tolerance.
- Human Rights between Islam and International efforts.
- Quality in Charity work .

Bodies and councils membership organizations :

Membership in numbers of scientific and intellectual , educational councils such as:

- Member of the Board of Higher Education universities in the Kingdom of Saudi Arabia, and a member of the Supreme Council of the University of Imam Muhammad bin Saud Islamic University, and Supreme Council for Umm Al-Qura University , and Supreme Council of King Saud University .
- Member of Board of Trustees of Islamic University in Islamabad, Pakistan , and Chairman of the University Curriculum Evaluation .
- Member of Board of Trustees of Islamic University in Kuala Lumpur , Malaysia.
- Member of Board of Supreme Council for Islamic Affairs in Saudi Arabia.
- Member of King Faisal Center for Research and Islamic Studies.

- Member of Board of Trustees for the King Faisal Foundation.
- Member of King Faisal Prize for Serving Islam .
- Vice President of World Council for Religion and Peace Board.
- Member of Board of Trustees of the International Islamic Relief Organizations.
- Member of Trustees of Makkah Foundation Charity
- Member of Board of Trustees of Ema'ar, the world body for education, and the world body for mosques.
- Member of the Charitable Society for Social Services in Medina .
- Member of the High Commission for the King Fahd Complex for Printing the Holy Quran .
- Member of the High Commission for the award of Prince Naïf bin Abdul-Aziz , the Prophetic Sunnah and Contemporary Islamic Studies .
- Member of the Charitable Society for the memorization of Holy Quran in Riyadh.
- Member of the Saudi Society of the Holy Quran and its Studies .
- Member of the Saudi Society for Sunnah and its Studies .
- Member of Supreme Commission Board for Tourism.
- Member of the Presidency of intellectual dialogue at King Abdul Aziz Center for National Dialogue.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

)
)
) 03 MDL No. 1570 (RCC)
ECF Case

This document relates to:

BURNETT, *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*, Case No. 03-CV-5738;
CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 04-CV-05970;
EURO BROKERS, INC., *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07279;
FEDERAL INSURANCE CO., *et al.* v. AL QAIDA, *et al.*, Case No. 03-CV-6978;
NEW YORK MARINE AND GENERAL INSURANCE CO. v. AL QAIDA, *et al.*, Case No. 04-CV-6105;
TREMSKY, *et al.* v. OSAMA BIN LADEN, *et al.*, Case No. 02-CV-7300; and
WORLD TRADE CENTER PROPERTIES LLC, *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07280.

**DECLARATION OF ALAN R. KABAT
IN SUPPORT OF DEFENDANT DR. ABDULLAH BIN SALEH AL-OBaid'S
CONSOLIDATED MOTION TO DISMISS**

I am an attorney licensed to practice in the District of Columbia and am admitted *pro hac vice* in this matter. I am with the law firm of Bernabei & Katz PLLC, counsel to Dr. Abdullah Bin Saleh Al-Obaid. I submit this declaration to transmit to the Court the following documents submitted in support of Dr. Al-Obaid's Consolidated Motion to Dismiss:

1. Exhibit 1 to Dr. Al-Obaid's motion to dismiss is a copy of the Declaration of Dr. Abdullah bin Saleh Al-Obaid (March 29, 2004).
2. Exhibit 2 to Dr. Al-Obaid's motion to dismiss is a copy of the Declaration of Abdulaziz H. Al Fahad (April 6, 2003).
3. Exhibit 3 to Dr. Al-Obaid's motion to dismiss is a copy of the announcement of

the Royal Embassy of Saudi Arabia, "Cabinet Reshuffle Affects Four Ministries" (Feb. 8, 2005), online at: <http://www.saudiembassy.net/2005News/News/NewsDetail.asp?cIndex=5034>.

4. Exhibit 4 to Dr. Al-Obaid's motion to dismiss is a copy of the website of the Royal Embassy of Saudi Arabia, "The Council of Ministers" (Aug. 2005), online at: <http://www.saudiembassy.net/Country/Government/Ministers.asp>.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on September 3, 2005.



ALAN R. KABAT

Exhibit 1

Dr. Abdullah Bin Saleh Al-Obaid's
Consolidated Motion to Dismiss

03 MDL No. 1570 (RCC)

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL No. 1570 (RCC)

THOMAS E. BURNETT, SR., *et al.*,

Plaintiffs,

v.

C.A. No. 03 CV 9849 (RCC)

AL BARAKA INVESTMENT AND DEVELOPMENT
CORPORATION, *et al.*,

Defendants.

DECLARATION OF ABDULLAH BIN SALEH AL-OBAID

I, Dr. Abdullah bin Saleh Al-Obaid, being duly sworn, declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth below of my own personal knowledge.

2. I have been informed by my attorney that I am a defendant (D23) in the above-captioned action. I am submitting this declaration in support of my Motion to Dismiss for (1) sovereign immunity, (2) lack of personal jurisdiction, and (3) improper service of process.

3. I was born in 1941, in Baday, Saudi Arabia, and have lived in Saudi Arabia all of my life, except for when I was studying in graduate school. I have always been a citizen of the Kingdom of Saudi Arabia.

4. I earned a Master's degree in Vocational & Curriculum Educational and Assessment from Oklahoma State University, and in 1979, earned a Ed.D. degree, in the same subject, also from Oklahoma State University. I also studied Arabic at the Islamic University of

Iman Mohammed Bin Saud, and have taken coursework in administration from the Institute of Public Administration, Riyadh. From 1980 to 1981, I was Assistant Deputy and Vice President of the Presidential of the Two Holy Mosques, a government agency responsible for the maintenance and operation of the Grand Mosque in Makkah and the Prophet's Mosque In Madinah. From 1981 to 1982, I was Vice President of the Islamic University, Al-Madina Al-Munawarah, Saudi Arabia. From 1982 to 1995, I was President of the Islamic University, Al-Madina Al Munawarah, Saudi Arabia.

5. I was the Secretary-General of the Muslim World League from 1995 until 2000. The Muslim World League is a charity that is sponsored and financially supported by the Saudi government. As Secretary-General, I was also one of eight members of the Supreme Council for Islamic Affairs, established by King Fahd by Royal Decree No. 296/8 (1994). The Supreme Council has responsibility for Saudi Arabia's Islamic policies in other countries. In my capacity as Secretary-General, I also served as an officer of the Rabita Trust, a charity that is partly owned by the Muslim World League, and partly owned by the government of Pakistan.

6. In 2001, I was appointed by Royal Decree to the Saudi Majlis-ash-Shura, which is the legislative body of the Saudi government, equivalent to a Parliament in other countries. I am one of eleven (11) members of the Committee of Islamic Affairs. And the head of the committee of seventh group for friendship in The Majlis-ash-Shura's.

The Majlis-ash-Shura's function is to advise King Fahd and his deputies on all issues of importance to the Kingdom. Its recommendations, if adopted, become governmental policy. The Committee of Islamic Affairs' function emphasizes all issues relating to Islam and the government's Islamic activities.

7. In March 2004, I was appointed by Royal Decree to be a founding member of the

National Society of Human Rights, a new entity. At its first meeting, held in the Shoura Council headquarters in Riyadh, I was elected to be a Chairman by the forty (40) other members, including ten women.

8. I have visited the United States on several occasions since 1975, with my last visit being in 2002. In my capacity as a member of the Supreme Council for Islamic Affairs and Secretary-General of the Muslim World League, I made visits to various offices of the Muslim World League around the world. I visited the Muslim World League office in New York in September 2000, where I spoke at an Islamic Seminar that was convened to discuss the proposed International Peace Summit for the Millennium. During that visit, I met with Kofi Annan, the United Nations Secretary General, to discuss proposed Islamic modifications to this International Peace Summit.

9. I own no real property in the United States. I also have no bank accounts, and have no investments in the United States. I do not conduct any personal business with any businesses in the United States.

10. I do not subscribe to or read either the *International Herald Tribune* or the *Al Quds al Arabi*. The latter publication, to my knowledge, is banned in the Kingdom of Saudi Arabia.

11. I have never supported the loss of innocent life and believe that there is no justification for the tragic attacks of September 11, 2001. I have never supported any person or organization that I have known to participate in terrorist activities. I was interviewed on Saudi television shortly after the September 11 attacks, and I condemned these acts.

12. The Third Amended Complaint in this case has no allegations about me, other than in six paragraphs. In Paragraph 248, it is stated that I and several other individuals were

“co-conspirators, material sponsors, and/or aiders and abettors and members of the terrorist enterprise of the International Islamic Relief Organization.” I deny that I had any knowledge of any activities of the International Islamic Relief Organization (IIRO) that were terrorist activities, or knowingly supported terrorism. Although the IIRO is a subsidiary of the Muslim World League, I was not involved with its day-to-day operations or activities.

13. In Paragraph 251 of the Third Amended Complaint, it is stated that I was one of three “officers at the Virginia office” of the Muslim World League. During my tenure as Secretary-General of the Muslim World League, from 1995 to 2000, I served in an ex officio capacity with several of its foreign offices, but was not responsible for the day-to-day operations or activities of the Virginia office. In Paragraph 260, it is stated that I was one of several “co-conspirators, aiders and abettors of the Muslim World League.” I deny that I had any knowledge of any activities of the Muslim World League that were terrorist activities, or knowingly supported terrorism.

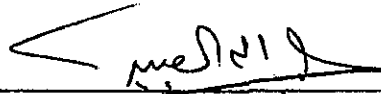
14. In Paragraph 273 of the Third Amended Complaint, it is stated that the Rabita Trust “is connected to the SAAR Network through two officers,” including myself. Although I served as an officer of the Rabita Trust in my capacity as Secretary-General of the Muslim World League, I was not involved in the day-to-day operations or activities of the SAAR Network or its components. I deny that I had any knowledge of any activities of the SAAR Network that were terrorist activities, or knowingly supported terrorism.

15. In Paragraph 252 of the Third Amended Complaint, it is stated that I “also run one of the al-Rajhi family’s largest corporations, al-Watania.” Similarly, in Paragraph 275, it is stated that I am “the Deputy General Manager at one of the al-Rajhi’s largest businesses, al-Watania Poultry in Saudi Arabia.” I deny that I had any involvement with this or any other

poultry business. I believe that the plaintiffs' attorneys may have confused me with someone else with a similar name, a former Deputy Minister of Agriculture in Saudi Arabia.

16. I can read and understand English.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in black ink, appearing to be 'Abdullah bin Saleh Al-Obaid', written over a horizontal line.

Dr. Abdullah bin Saleh Al-Obaid

Executed on the 29 day of March, 2004.

Exhibit 2

Dr. Abdullah Bin Saleh Al-Obaid's
Consolidated Motion to Dismiss

03 MDL No. 1570 (RCC)

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THOMAS BURNETT, *et al.*,

Plaintiffs,

v.

AL BARAKA INVESTMENT AND
DEVELOPMENT CORPORATION, *et al.*

Defendants.

Civil Action No. 1:02CV01616
Judge Robertson

DECLARATION OF ABDULAZIZ H. AL FAHAD

I, Abdulaziz H. Al Fahad, declare as follows:

1. This declaration is given at the request of United States counsel for His Royal Highness Prince Sultan bin Abdulaziz Al-Saud, to describe certain matters of fact and law in connection with Prince Sultan's motion to dismiss the complaint in this action. I have been retained by Prince Sultan and am being compensated for my work in this matter.

2. I am a lawyer admitted to practice in the Kingdom of Saudi Arabia. I was born and raised in Saudi Arabia, and received an undergraduate, graduate and legal education in the United States. I received a B.A. degree in economics from Michigan State University in 1979, an M.A. in International Relations from the Johns Hopkins University School of Advanced International Studies in 1980, and a J.D. degree from Yale Law School in 1984. During 1984-1985, I was a Post-Doctoral Fellow at the Harvard's Center for Middle Eastern Studies and a Research Fellow at Harvard Law School.

3. Currently I am the principal of the Law Office of Abdulaziz H. Fahad in Riyadh, in affiliation with the United States law firm Akin, Gump, Strauss Hauer & Feld. I am a member of the Academic Committee, Legal Experts Commission, Council of Ministers (which is charged with translating official government documents); a member of the Advisory Commission of the Supreme Economic Council; and a member of the International Trade Committee of the Council of Saudi Chambers of Commerce and Industry. I have occasionally taught and written on Middle Eastern law, politics and economics. I am also a licensed Arabic to English translator, holding Licence No. 138 issued by the Ministry of Commerce of the Kingdom of Saudi Arabia.